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GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF ARGEMIRA FLÓREZ IN
SUPPORT OF GOOGLE'S OPPOSITION TO
PLAINTIFF SAL CATALDO'S MOTION FOR
VOLUNTARY DISMISSAL WITHOUT
PREJUDICE**

Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020

Trial Date: August 18, 2025

1 I, Argemira Flórez, declare as follows:

2 1. I am a licensed attorney in California and an associate at Cooley LLP, located at 3
3 Embarcadero Center, San Francisco, California 94111. I am counsel of record for Defendant
4 Google LLC (“Google”) in this action. Unless otherwise stated, the facts I set forth in this
5 declaration are based on my personal knowledge or knowledge I obtained through my review of
6 corporate records or other investigation. If called to testify as a witness, I could and would testify
7 competently to such facts under oath.

8 2. I submit this declaration in support of Google’s Opposition to Plaintiff Sal Cataldo’s
9 Motion for Voluntary Dismissal Without Prejudice (ECF No. 576).

10 3. On June 24, 2025, Plaintiffs’ counsel sent Google’s counsel a draft of the Pretrial
11 Statement announcing Plaintiff Sal Cataldo’s intention to voluntarily dismiss his claims. Google
12 agreed to meet and confer on the issue.

13 I declare under penalty of perjury that the foregoing is true and correct to the best of my
14 knowledge.

15 Executed in San Fransico, California on August 8, 2025.

16
17
18 /s/ Argemira Flórez
Argemira Flórez